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UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE NEW YORK TIMES COMPANY and
NEIL BEDI,

Plaintiffs,
v.

UNITED STATES DEFENSE
COUNTERINTELLIGENCE AND SECURITY
AGENCY,

Defendant.

25 Civ. 2333 (DLC)

NOTICE OF MOTION FOR SUMMARY JUDGMENT

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law in Support of Motion for Summary Judgment, as well as the Declaration of Charles D. Watters, defendant United States Defense Counterintelligence and Security Agency, by its attorney, Jay Clayton, United States Attorney for the Southern District of New York, hereby moves this Court for an order pursuant to Federal Rule of Civil Procedure 56 entering summary judgment in favor of the defendant.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Court's scheduling order, ECF No. 9, opposition papers, if any, must be served upon the United States Attorney's Office, Southern

District of New York, 86 Chambers Street, 3rd Floor, New York, New York, 10007, no later than June 27, 2025.

Dated: May 30, 2025
New York, New York

Respectfully submitted,

JAY CLAYTON
United States Attorney

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To: Dana Green, counsel for plaintiffs (by ECF)